

JEFFREY S. RUGG, ESQ., Bar No. 10978
jrugg@bhfs.com
BENJAMIN K. REITZ, ESQ., Bar No. 13233
breitz@bhfs.com
BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
Telephone: 702.382.2101
Facsimile: 702.382.8135

*Attorneys for Defendants Volkswagen Group of
America, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DYLAN TODD and EMILY TODD,
individuals;

Plaintiffs,

v.

VOLKSWAGEN GROUP OF AMERICA,
INC., a corporation; VOLKSWAGEN
AKTIENGESellschaft, a business
entity, form unknown; AND DOES 1
through 20, inclusive,

Defendants.

Case No.: 2:16-cv-01735-RFB-PAL

**STIPULATION AND PROPOSED ORDER
TO EXTEND TIME**

Defendant Volkswagen Group of America, Inc. ("VWGoA" or "Defendant"), by and through its counsel of record, the law firm of Brownstein Hyatt Farber Schreck, LLP, and Plaintiffs Dylan Todd and Emily Todd ("Plaintiffs"), by and through the undersigned counsel of record, the law firm of Hyde & Swigart, hereby stipulate and agree as follows:

In order to conserve the resources of the parties, their counsel and the judiciary, Defendant shall have thirty (30) days to answer or otherwise respond to Plaintiff's Complaint following entry of this Court's decision on Defendant's Motion to Stay (ECF No. 4).

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
702.382.2101

Dated this 8th day of August, 2016.

BROWNSTEIN HYATT FARBER
SCHRECK, LLP

By: /s/ Jeffrey S. Rugg
JEFFREY S. RUGG, ESQ.
BENJAMIN K. REITZ, ESQ.,
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
Telephone: 702.382.2101
Facsimile: 702.382.8135

*Attorneys for Defendants Volkswagen Group
of America, Inc.*

Dated this 8th day of August, 2016.

HYDE & SWIGART

By: /s/ Sara Khosroabadi
SARA KHOSROABADI, ESQ.
7854 W. Sahara Ave.
Las Vegas, NV 89117
Telephone: (619) 223-7770
Facsimile: (619) 297-1022

*Attorneys for Plaintiffs Dylan Todd and Emily
Todd*

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: _ August 9, 2016

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
702.382.2101

CERTIFICATE OF SERVICE

Pursuant to Fed.R.Civ.P.5(b), and Section IV of District of Nevada Electronic Filing Procedures, I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and that the foregoing **STIPULATION AND PROPOSED ORDER TO EXTEND TIME** was served via electronic service on the 8th day of August, 2016 and to the addresses shown below:

SARA KHOSROABADI, ESQ.
sara@westcoastlitigation.com
HYDE & SWIGART
7854 W. Sahara Ave.
Las Vegas, NV 89117
Telephone: (619) 223-7770
Facsimile: (619) 297-1022
Attorneys for Plaintiffs Dylan Todd and Emily Todd

/s/ Karen Wiehl

An employee of Brownstein Hyatt Farber Schreck, LLP